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Can you please explain the highlighted area of Example 4? Does the 1,200 hour max. come from taking 12 months to work 1,200 hours at a rate of 25 hours/month (25 \* 12 months \* 4 weeks in a month = 1,200)? If so, this doesn't seem to work as there are not always 4 weeks in a month.

Example 4. (i) Facts. Employee *D* begins working 25 hours per week for Employer *Z* on January 3 and is considered a part-time employee for purposes of *Z*'s group health plans. *Z* sponsors a group health plan that provides coverage to part-time employees after they have completed a cumulative 1,200 hours of service. *D* satisfies the plan's cumulative hours of service condition on December 15.

(ii) Conclusion. In this Example 4, the cumulative hours of service condition with respect to part-time employees is not considered to be designed to avoid compliance with the 90-day waiting period limitation. Accordingly, coverage for *D* under the plan must begin no later than the 91st day after *D* works 1,200 hours. (If the plan's cumulative hours of service requirement were more than 1,200 hours, the Departments would consider the requirement to be designed to avoid compliance with the 90-day waiting period limitation.) <http://www.irs.gov/pub/irs-drop/n-12-59.pdf>